

EXHIBIT A

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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

BOYAJIAN PRODUCTS, LLC,

Plaintiff,

v.

ENBY LLC,

Defendant.

Case No. 3:20-cv-01991-HZ

MEMORANDUM OF LAW ON BEHALF
OF 553 NON-BINARY (OR “ENBY”)
INDIVIDUALS AS AMICI CURIAE IN
SUPPORT OF DEFENDANT ENBY
LLC’S MOTION TO DISMISS

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PRELIMINARY STATEMENT

Plaintiff Boyajian¹ seeks to stop Defendant Shop Enby from accurately describing itself as an online shop, run for and by people who are non-binary. That is, “enby” is simply the shortened, more casual way the community says “non-binary” (non-binary shortens to “N.B.,” which gets pronounced and rendered “enby”). And if one goes to shopenby.com, they will find just that: a shop, run by people who are enby, for people who are enby.

In seeking to monopolize this bit of language, Boyajian doesn’t even allege they use the word “enby” in the same way: their use describes a product, Shop Enby’s describes a store. And despite an alleged likelihood of confusion, Boyajian fails to allege that even a single consumer has been confused.

That is because they cannot. *Amici* are all themselves enby (or non-binary). They write because this suit troubles them: if Boyajian can monopolize and exclude the enby owners of Shop Enby from accurately stating “we are an enby shop,” what comes next? *Amici* and their community have fought long and hard to even *have* language to describe themselves. They ask this Court to provide them assurance that they will be able to continue to accurately describe themselves to the world, free from fear of legal consequences.

STATEMENT OF INTEREST

The 553 individual *amici* listed in the addendum to this brief are all non-binary – or, informally “enby” – people. They range in age from their teens to their

¹ Names and other terms are defined in the body of the brief below.

50s and hail from across the globe – from right here in Portland, to Japan, to Australia. *Amici* work in a wide variety of fields as well, ranging from the sex toy industry where this dispute arises to a wide variety of advanced fields requiring multiple degrees. In short, *amici* represent a wide-ranging snapshot of the experience of enby people across the world – and their perspective on the word “enby” reflects that.

As detailed throughout this brief, these enby *amici* have a profound interest in ensuring that words used to describe their identity are not monopolized and, essentially, taken out of use for the sake of private profit. That is, “words are not always fungible, and that the suppression of particular words runs a substantial risk of suppressing ideas in the process.” *S.F. Arts & Ath., Inc. v. United States Olympic Comm.*, 483 U.S. 522, 532 (1987) (cleaned up). Or, as **Florence Ashley**² (28, Jurist/Bioethicist) puts it:

Without language to speak to our identity and experiences, how can we know ourselves and make ourselves known to the world? Philosophers call this hermeneutical injustice: the injustice of being deprived of your ability to communicate knowledge. [...]

While ‘non-binary’ is great, it is also lengthy and an adjective meaning that if I want to describe myself using a noun, I have to go for ‘person’ which is great but fails to emphasize my gender in the way that ‘man’/‘woman’ does. ‘Enby’ is that word for me, helping me tell people my gender in a concise manner that rolls off the tongue. It’s an important part of my daily practices and makes me feel visible in a world that too often wishes I didn’t exist.”

Kel O’Hara (28, Attorney) explains, “Just as ‘man’ and ‘woman’ are easy words for

² *Amici* are indicated with bolding throughout this brief. Mx. Ashley is notable for also being the first openly transfeminine person to clerk for Canada’s Supreme Court.

gender identity that do not require the users to get into the intimate details of how they understand themselves and their gender, so is ‘enby’ for me.” That is, *amici*’s interest is in having a word that communicates who they are – and in commercial enterprises advertising themselves as open to *amici*.

Put simply, for *amici*, it is vital for enby-oriented business to answer the question “what are you?” with the clear, correct answer: an “Enby[-friendly] Store,” an “Enby[-owned] Store,” or any other manner of store that *exists for and is run by people who are enbies*. Cf. *Filipino Yellow Pages, Inc. v. Asian Journal Publ'ns, Inc.*, 198 F.3d 1143, 1151 (9th Cir. 1999) (“If faced with the question ‘What are you?,’ FYP’s Filipino Yellow Pages, AJP’s Filipino Consumer Directory, and the Filipino Directory of the U.S.A. and Canada could all respond in the same way: ‘A Filipino yellow pages.’”). If Plaintiff’s claims proceed, *amici* will be chilled from giving the true, descriptive answers to everyday questions.

ARGUMENT

I. The Word “Enby” Describes the 553 Enby *Amici*, Just as it Describes the Product Plaintiff Sells.

As explained in Enby LLC’s brief, both of Enby LLC and Boyajian’s uses of the term “enby” are purely descriptive. Plaintiff Boyajian Products, LLC (“Boyajian”) claims they started making a sex toy they call the “Enby” rechargeable vibrator in the middle of 2019. ECF No. 1 ¶ 7. In the last decade, “enby” has entered common use in the queer – and in particular, in the transgender and non-binary – community, as a shortening of “non-binary” (non-binary shortens to “n.b.,” which is pronounced “enby”). And as Boyajian explained, the name was intentional:

“We wanted to ... banish the binary by offering non-gendered products.” ECF No. 13-5 at 5. Enby LLC (“Shop Enby”) runs an online store at “shopenby.com.” They are, per their website, “a Black/Trans owned company run by 3 enby’s and believe that all bodies deserve affirmation and pleasure.” Hence the name and web address.

As explained below, for *amici*, the value of simply having language to describe themselves cannot be overstated. As **Kendra Albert** (31, Lawyer) notes, “even ‘limited’ claims to own an identity marker can significantly chill speech.” And that chill would touch on *amici*’s very identities and selves.

a. The history and importance of the word “enby”

The relationship between the non-binary community – or the queer community at large – and language is a complicated one. **J.M. Archer** (20, Freelance Writer & Dramaturge) explains, “We, queer folks, are charged with carving an identity out of the world whether we enjoy doing so or not. It’s extremely important that our lexicon is varied, consistent, and free, and that any word describing our experiences is available to be claimed or reclaimed by us.” For non-binary people like *amici* in particular, that process of carving out an identity may involve creating new terminology from whole cloth – in part, because much of our language begins by presuming sex and gender fall into two, neat categories.

It was this problem that **Vector Plasm** (or, “revolutionator” on Tumblr) (31, Japanese-English Translator) set out to fix in coining “enby” online in 2013:³

When I first came up with the word it was because I was lamenting the lexical gap for children without gender. Men have boy. Women have girl. I thought enby would make a good replacement for children who were not gendered, being a cute smush of vocalizations of the letters N and B (for Non Binary). The word has been used in far more applications than I could ever have dreamed of back in 2013 when I thought it up and I think that is beautiful. Many adults tell me that it’s a word that speaks to them and defines them and I am happy for them even if that was not the original intent of the word. It is a word to give people language.

That playful spirit remains for many *amici*. **Eric Davies** (30, Software Developer) explains that “[i]t is a convenient short way to say ‘non-binary’ or ‘non-binary person [and i]t lends itself well to portmanteaus (e.g., ‘enbyfriend’ instead of ‘girlfriend’ or ‘boyfriend’). Or, as **A. Cody Kuhn** (25, TA/Graduate Student) puts it, “Enby has been a cute shorthand, one of the first words that felt more comfortable and less technical, more ‘right.’” **TJ Sheff** (29, Construction Safety Manager) similarly notes that, “[s]o much descriptive language for identity is super formal[.] Having a shorter, informal term like ‘enby’ to describe myself is super nice! The world’s a dark, serious place sometimes. My gender doesn’t have to be, though.” And for some *amici*, like **Darain Bemis** (23, Unemployed), the value of “enby” is as simple and mundane as the fact that “nonbinary takes a while to say and to type.”

Other *amici* emphasize that they need the word “enby” for their work, personal, and political lives. **Shelby Cragg** (28, Artist) explains, “I am an author

³ See also, Jay Logan, *Queer Etymology: Enby*, MEDIUM (Dec. 16, 2019) (noting that a “September 2013 post, originally from Tumblr user revolutionator[] is the origin of the term [enby].”)

writing a book with nonbinary main characters. My work would not be possible without this language!” Reflecting on this suit, **Dre Ceja** (24, Director of Training & Education) worries that this case might set “a very disturbing precedent[:] Will I be able to use the word ‘enby’ in my inclusion trainings? In my upcoming book? In my posters for transgender and non-binary support groups? In fundraisers for the lifesaving programs that my center provides?”

Speaking to the personal importance, **Ryn Daniels** (34, Site Reliability Engineer) notes that “[g]etting to try on different words and labels is an important part of the process of self-exploration for many people.” And turning that experience outward, **Aran Ink** (30, Software Engineer) says, “A lot of the trans experience involves forming connections with other trans people, learning what you do and don’t have in common, and sharing skills and insight into navigating through a world that frequently misunderstands and mistreats you. Having access to language that is both descriptive and convenient is crucial to helping this process happen.” As for the political, “non-binary people have always existed, but we didn’t have a social movement until we had language to describe ourselves,” observes **Tilde Thurium**, (36, Software Engineer).⁴

⁴ Cf. also, Megan Davidson, *Seeking Refuge Under the Umbrella: Inclusion, Exclusion and Organizing Within the Category Transgender*, 4 Sexuality Research & Social Policy 61, 62 (Dec. 2007) (discussing the history of the word “transgender,” and noting, “[f]or many, how they framed their own identity and embodiment in relation to this category was intimately tied to how they conceptualized the term *transgender* and, therefore, how they perceived this social movement and the gains for which it should fight.”).

But the stakes here are not just playful, professional, or political. They can be life and death as well. **Kit Stubbs** (39, Founder & Exec. Director of a Non-Profit) recalls that “[h]aving language to describe my identity has been crucial to my mental well-being.” But, “[l]earning the terms ‘non-binary’ and ‘enby’ helped me name my own experiences, which was incredibly affirming! Having these terms also meant that I could use them to find other people who have had similar experiences. Once I started looking around for other non-binary folks, particularly online, I started feeling less lonely and isolated.” **Pippin Shaeffer** (24, Student) is more blunt: “I didn’t have the word[s] ‘nonbinary’ and ‘enby’ in my life until I was 19 ... Since then, I have seen a significant reduction in the severity of my major depressive disorder and in the frequency and severity of suicidal ideation.”⁵ As is **Dave Macdonald** (41, Accountant): “I went decades without language to describe how I am and it was harmful. I self-harmed, was at the risk of suicide, and was in relationships where my partners and parents couldn’t understand me.”

⁵ See also, World Prof’l Ass’n for Transgender Health, *Standards of Care for the Health of Transsexual, Transgender, and Gender Nonconforming People* 4-5; 9-10 (7th ed. 2012) (recognizing that living consistently with one’s gender identity significantly improves health outcomes among people who experience gender dysphoria, and noting that anxiety and depression “are socially induced and are not inherent” to transgender status); Lily Durwood et al., *Mental Health and Self-Worth in Socially Transitioned Transgender Youth*, 56(2) J. Am. Acad. Child & Adolescent Psychiatry 116, 120 (2017) (finding normal levels of depression in transgender children who had already socially transitioned as compared to a control group of non-transgender children, unlike previous studies’ findings of “markedly higher rates of anxiety and depression and lower self-worth” among “gender-nonconforming children who had not socially transitioned”).

Beyond that, having just one word to describe one's self is often not enough. .

Eli Sander (29, Data Scientist) explains, "It's important to me to have many different words to describe my identity; every word has a different feeling, and is appropriate in different situations. Think about how many words we have for a man – guy, dude, bro, boy, to name a few – those words let people express themselves more richly. I found having multiple words for non-binary identities to be especially helpful when I was coming to terms with my own identity, because it helped me understand and explore the diversity in the non-binary community and consider where I fit in." More than that, as **Vic Wiener** (31, Lawyer) observes, enby "also serves an important linguistic role. It is grammatically incorrect to say, "I am a nonbinary." However, it is correct to say, 'I am an enby!' It is the term many of us use where others would typically say, 'I am a man,' or 'I am a woman.'"

All told, being able to freely use the word "enby" – and to have it freely available even in commercial contexts – is of vital importance to *amici*. It is a useful, easy answer to the ever-present question of, "what are you?" *Amici* are "enby." And the significance and meaning of the word "enby" come from the community, not from Boyajian. As **Magdalen Wulf** (24, Doula) notes, "We in the queer community have used this word to describe aspects of our identity for a long time now without ever hearing of this brand. They did not coin the term; they got it from us."

Thus, **Marsel Dorais** (25, Tattoo Artist) offers this profound summary:

I believe language holds so much power. Language is molded by our values, by history, by culture. It is something that we are born into, and that we

maybe feel like can never change, because it feels timeless and bigger than us. When actually, it is ever changing, as it is living. Every time we speak, it lives. Language can often be overlooked, underestimated, but our words holds our truths, and it is important that we get to chose the ways in which our truth(s) need to be held.

b. The names of Boyajian’s “Enby” toy and the Enby Store both simply answer the question, “What are you?”

The goal of trademark law is ultimately to ensure accurate consumer knowledge – and to protect the consumer. *See generally, What is a Trademark?*, 1 McCarthy on Trademarks and Unfair Competition § 3:1 (5th ed.). The law incentives sellers of goods to tell consumers what it is they are buying, so consumers can consistently find goods that they want – and correctly identify the source of those goods. So, the Lanham Act requires that any trademark protected against infringement be distinctive. That is, identifiable as originating from a particular source. 15 U.S.C. § 1052; *Two Pesos, Inc. v. Taco Cabana, Inc.*, 505 U.S. 763, 768 (1992). Distinctiveness can either be inherent or acquired. 15 U.S.C. § 1052. And without distinctiveness, a mark receives no protections, except in rare cases when a descriptive mark acquires some secondary meaning (usually through extensive advertising or exclusive use over a long period of time⁶). 15 U.S.C. § 1052(f).

⁶ Common law protection in a particular region generally also requires some minimum of sales in that region. *Hanginout, Inc. v. Google, Inc.*, 54 F. Supp. 3d 1109, 1118 (S.D. Cal. 2014) (citing *Credit One Corp. v. Credit One Fin., Inc.*, 661 F. Supp. 2d 1134, 1138 (C.D. Cal. 2009) (“A party asserting common law rights must not only establish that it is the senior user, it must also show that it has ‘legally sufficient market penetration’ in a certain geographic market to establish those trademark rights.”)). Sporadic internet sales often cannot establish this base level of sales for common law protection. *Optimal Pets, Inc. v. Nutri-Vet, LLC*, 877 F. Supp. 2d 953, 962 (C.D. Cal. 2012) (finding no market penetration in any geographic location based on evidence of internet sales to 16 states totaling less than \$10,000 in one year); *Hanginout, Inc. v. Google, Inc.*, 54 F. Supp. 3d 1109, 1121-4 (S.D. Cal.

Common law trademark protection in Oregon similarly requires that the mark protected be distinctive or have acquired secondary meaning. *Ernst Hardware Co. v. Ernst Home Ctr., Inc.*, 895 P.2d 1363, 1365 (Or. Ct. App. 1995).

In evaluating whether a mark is generic or descriptive⁷ “and therefore not protected under trademark law,” the Ninth Circuit “favor[s] the ‘who-are-you / what-are-you’ test: A protectable mark answers the buyer’s questions ‘Who are you?’ ‘Where do you come from?’ ‘Who vouches for you?’ But the generic name of the product answers the question ‘What are you?’” *Premier Nutrition, Inc. v. Organic Food Bar, Inc.*, 327 F. App’x 723, 723-24 (9th Cir. 2009) (cleaned up), *citing Filipino Yellow Pages*, 198 F.3d. at 1147. “Generic terms, describing ‘what’ a product is, do not enjoy trademark protection because they do not identify the source of a product.” *Swanson v. Instagram, LLC*, 716 F. App’x 743, 744 (9th Cir. 2018).

In the first instance, as the USPTO aptly concluded, the use of ENBY by Boyajian is descriptive because “[a] mark that describes an intended user or group

2014) (finding insufficient evidence for market penetration without evidence of registered users in the relevant market). Other courts have also suggested that the nature of the internet would require some level of allowance for concurrent online use by common law mark owners. *Dudley v. Healthsource Chiropractic, Inc.*, 883 F. Supp. 2d 377, 394–96 (W.D.N.Y. 2012). Plaintiff’s complaint fails to even attempt to plead over these hurdles with anything but unadorned legal conclusions.

⁷ As various courts have observed, “distinctions between generic and descriptive and descriptive and suggestive are often illusory.” *Fryer v. Brown*, No. C04-5481 FDB, 2005 U.S. Dist. LEXIS 20830, at *7 (W.D. Wash. July 15, 2005). And that may be for good reason. “In a sense, a generic designation is the ultimate in descriptiveness.” J. T. McCarthy, *Trademarks and Unfair Competition* § 12:5, at 538 (2d ed. 1984).

of users of a product or service is merely descriptive.” ECF No. 13-2 at 42. But the term is also generic, because the name “Enby” does not describe “who vouches” for Boyajian’s toy. Nor does it describe “where” or “who” the toy is or comes from. Rather, as press coverage emphasizes, the name describes *what* the toy is: a sex toy designed for enby users. For example, coverage of Boyajian’s toy in Allure even begins with a “question [the author] could not answer: ‘Where are all the sex toys for transgender men?’” and explains that Boyajian’s Enby answers that question because “the enby was designed to fit the needs of any genitals and gender, *thus the name*.” Jennings Exh. 2 (ECF No. 13-3) at 3-4 (emphasis added). *See also, e.g.*, Jennings, Exh. 3 (ECF No. 13-4) at 2 (“Ever thought a sex toy should work for everyone, regardless of gender? The founders of sex toy retailer [Boyajian] agree. The company’s newest product, Enby, is the first gender-neutral sex toy on the market.”).⁸

Indeed, a handful of *amici* even own the Enby toy (though they now have mixed feelings about the purchase) but make clear they do not understand the name to identify a source – but as a toy marketed to them because they were non-binary. Of those *amici*, **Monroe Standish** (20, Student) explains, “When I purchased it, I loved having an androgynous toy that was an extension of myself.

⁸ To that point, apparently, in Boyajian’s interviews with Ask Men magazine, they noted that “Enby was designed, and lovingly crafted after the minds at [Boyajian] who spent countless hours querying the LGBTQ community on their secret wishes and desires. Above all, it was important to them – and their broadening range of customers from all walks of life – that the Enby did not project an identity or sexual style upon the user.” *Id.* at 4.

But that is all it is... an extension. [Boyajian] do not own being Enby. They do not own me. They do not own my Identity, and I am appalled that they would try to.” Yet, it is not as if *amici* all object to being marketed to. More broadly, because “[s]ex toy marketing tends to be heavily gendered,” **Stevonnie Ross** (47, Copyeditor), “applaud[s] attempts at catering to the nonbinary market, but [makes clear that] common terms for members of our community shouldn’t be reserved for the exclusive use of one company.” Thus, **Florence Ashley** concludes, “Anyone told the term ‘enby,’ even in the context of sex toys, would think of non-binary people and of toys that are intended to benefit their diverse bodies without undue gendering.”

Ultimately, Boyajian’s claimed mark is generic in the same way set out in *Filipino Yellow Pages*. 198 F.3d 1143 (9th Cir. 1999). *Filipino Yellow Pages* concerned, as the name suggests, whether “combining the generic terms ‘Filipino’ and ‘yellow pages’ to form the composite term ‘Filipino Yellow Pages’ creates a generic or a descriptive term.” 198 F.3d at 1148. Here, Plaintiff does not even have *that* much: They have only combined “enby” with the word “the” (and placed it near the word vibrator in all their copy). So, just as “[t]he word ‘Filipino’ is a clearly generic term used to refer to ‘a native of the Philippine islands’ or ‘a citizen of the Republic of the Philippines’” (198 F.3d at 1147), the word “enby” is a generic term used to refer “to a person who does not identify their gender specifically as either a male or a female.” ECF No. 13-2 at 42 (USPTO report). An “enby [vibrator]” is a vibrator for enby people. *Cf. also, United States PTO v. Booking.com B.V.*, 140 S.

Ct. 2298, 2309 (2020) (Breyer, J., dissenting) (“What is Booking.com? To answer this question, one need only consult the term itself.”).

II. If Plaintiff Has Any Mark, It Cannot Cover Defendant’s Use of the Word Enby.

Amici’s core interest in this case is in ensuring that the word enby – a word that describes who they are – is available for their use, without restriction. Thus, even if the Court finds Plaintiff has *some* rights in the word (it should not), the scope of those rights should be narrow. And, for the same reasons that *amici* should be allowed to use the word “enby” to describe themselves, Shop Enby’s non-binary owners’ use of “enby” should not violate even the hypothetical, weak rights Boyajian has.

As the Supreme Court recently explained in *Booking.com*, “[w]hen a mark incorporates generic or highly descriptive components, consumers are less likely to think that other uses of the common element emanate from the mark’s owner.” *United States PTO v. Booking.com B.V.*, 140 S. Ct. 2298, 2307 (2020). And more to the point, “even where some consumer confusion exists, the doctrine known as classic fair use protects from liability anyone who uses a descriptive term, fairly and in good faith and otherwise than as a mark, merely to describe her own goods. *Id.* at 2307-08. That is, to prevail, Boyajian needs to have pled that Shop Enby’s use of the term “enby” is not only “to describe the goods or services of a party.” *New Kids on the Block v. News Am. Publ’g, Inc.*, 971 F.2d 302, 306 (9th Cir. 1992) (alteration adopted), *citing* 15 U.S.C. § 1115(b)(4). And they do not – and cannot. Shop Enby is – literally – a shop, run by and for people who are enbies. Hence, “shopenby.com.”

It is, to be sure, not particularly clever. But that lack of cleverness is (at least in part) what places Shop Enby's use beyond the strength of any mark Boyajian could hypothetically obtain.⁹

For *amici*, this limitation on the strength of any putative mark – and the chill that would accompany any doubt on that limitation – is vital. Important here is the fact that Boyajian has labeled a particular *product* “enby,” while Shop Enby has used it to identify their entire business. That mismatch is important: with the weak reach of any potential mark, it is hard to see how any consumer would be confused. And beyond that, there are virtually identical uses of the word “enby” to Shop Enby's. For example, ENBY Magazine has been publishing since 2016.¹⁰ Maybelline has sponsored an award show simply called “ENBY” in India (and subtitled, appropriately, “The Non-Binary Awards”) while a burlesque show in London is titled “The Enby Show,” to say nothing of the purely descriptive uses – outside naming things – that abound. So, any consumer confusion that Shop Enby is really owned by Boyajian is hard to imagine. As **Johann Koehle** (32, Researcher) notes, “It would be as if the publishers of Girl Magazine had sued the publishers of Brown Girl, American Girl, GirlsLife, It Girl, or Girl's World. If you

⁹ Thus, in *Booking.com*, the Supreme Court suggested that allowing Booking.com to register a mark for “Booking.com” would not cause any chill to vendors seeking to use marks like “ebooking.com” or “hotel-booking.com.” 140 S. Ct. at 2307. *See also, id.* at 2315 (Breyer, J., dissenting) (“Not to worry, the Court responds, infringement doctrines such as likelihood of confusion and fair use will restrict the scope of protection afforded to ‘generic.com’ marks”).

¹⁰ *See* “Issues,” ENBY MAGAZINE, available at <https://www.enbymag.ca/issues>.

choose to name your product after a gender, you have to expect that someone else might have the same general idea.”

When confusion *might* emerge, however, would be in how people react to this suit being permitted to go forward. That is, the “threat of costly litigation will no doubt chill others from using variants on [‘Enby’].” 140 S. Ct. at 2315 (Breyer, J. dissenting). As **Sophia Pelecanos** (31, Law Student/Paralegal) explains, “[t]his term is extremely common in the community. It is how many people identify. To trademark it would be uncomfortable because people will continue to use it. It would be unfortunate for this to repeatedly appear in court rooms for violation of a trademark or lose our ability to use it.” **Lila Garrott-Wejksnora** (39, Writer) also fears the scope of chill, explaining, “this is a word my son’s preschool class uses. [Boyajian] would either fail to defend its trademark or wind up suing a lot of random people, including, I emphasize, my son’s actual preschool.” Or, as **Lena Fanya Aeschbach** (25, Scientific Assistant) puts it, “it is an entire gender of people that have been limited in their own expression. It doesn’t make sense to me how this can be possible.” And as **Djuna Delker** (23, Student) explains, “by trademarking [“enby,” Boyajian] will take away the opportunity for other trans people to grow projects with it. Non-binary people are more likely to be at financial risk due to hiring discrimination or being rejected by family and community. So it’s a downright evil move as a non-binary person to deny other non-binary people job and business opportunities like that.”

Thus, **Ryn Daniels** cautions, “even if the owners of [Boyajian] themselves identify as nonbinary, it is not a word that belongs *only* to them. Words like ‘enby’ belong to everyone, and you do not get to claim them for yourself and try to take them away from the community they belongs to.” Shop Enby, like *amici* themselves, cannot – consistent with trademark law – be forbidden from correctly and accurately describing their shop as a shop for and by enbies. **Emma McClure** (31, Graduate Student) worries that, if the claims proceed, “it is an entire gender of people that have been limited in their own expression. It doesn’t make sense to me how this can be possible.” And **Elle Dietz** (29, Researcher) fears there is no stopping point: “If I use [‘enby’] to describe myself publicly in my own business, what’s to stop them from sending me a cease and desist on my own personhood? If they take this word, our identity, from us the non-binary community... then what do we have? Maybe we’ll make a new word, but then what’s to stop another company from coming and taking it away?”

CONCLUSION

In the end, it is of the deepest possible significance to *amici* that they be able to freely use the word “enby.” They, just like Defendant, need to describe themselves with the limited language available. One of *amici*, whose native language is not English and does not have ungendered pronouns (**Karolina Kubinova** (23, Customer Support Specialist)), notes that this absence of language “makes me extremely uncomfortable to the point where I would rather not talk about myself at all.” And that is the ultimate effect Plaintiff’s case would have:

taking away limited language when, as **Brianna Rafidi** (25, State Manager) notes, “this community already has so few words to use for itself.”

For all the reasons above, then, *amici* urge the Court to grant the motion to dismiss.

Dated: January 29, 2021
Brooklyn, New York

Respectfully Submitted,

/s/ J. Remy Green

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(*pro hac vice motion forthcoming*)
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¹¹ Law student Sarah Marmon, who is not a member of the bar of any court, also helped prepare this brief.

ADDENDUM: LIST OF 553 INDIVIDUAL AMICI

Eric Rand

Systems Administrator
Frazier Park, CA

CeCe Berman

Operations Team Leader
South Jordan, UT, USA

Bee Nanase Barbera

Self employed/performer
South Jordan, UT

Eli Sander

Data scientist
Chicago, IL

Florence Ashley

Jurist and bioethicist
Toronto, Canada

Johann Koehle

Researcher
Santa Barbara, California

Penina Gold

Attorney and Translator
New York, NY

Vic Wiener

Lawyer
Bixby, Oklahoma

Jessa Hurty

SEO manager
Midvale UT

Kara Nowakowski

Law Graduate
Ridgewood, New York

Jen Hintz

Jewelry artist
Somerville, MA

Kel O'Hara

Attorney
Oakland, CA

Anilyka Barry

unemployed
Quebec, Canada

Josh Wright

Programmer
Houston, TX

Marsel Dorais

Tattoo artist
Tio'tia:ke ("Montréal"), "Québec,"
"Canada"

Rob Hill

Instructional Designer
Chicago, IL

Oaklin Blaisdell

Graduate Student
Brunswick, Maine

Syd Shafer

Web & Graphic Designer
San Francisco, CA

Vern Harner

Doctoral candidate
Seattle, WA

Bryan Pinamonti

Unemployed
Hoboken, NJ

Hikaru Mernin
Cultural Competency Consultant
California

Lorilei Williams
Attorney
Atlanta, Georgia

Mer Francis
Researcher
St. Louis, Missouri

Annie Chen
Law Student
Ottawa, ON

Kali “Mary” Jensen
Disability Advocate
San Diego, CA

Staver Klitgaard
After school art teacher and painter
Brooklyn, New York

Lara Tobin
Social Worker
Roscoe, NY

Jason Seawright
Professor
Evanston, IL

Nael Sideralis
Paralegal/student
White Lake, MI

Scott Maddix
Theater Management and Production
Salt Lake City, Utah

Bridget Lawson
Law Fellow
Washington DC

Sunny Maxwell
Law student
Salem, Oregon

Ki Gurholt
Education Tech
South Salt Lake, UT

Miranda Riddle
Teacher, Freelance creator
Los Angeles, CA

Echo Gregor
Web Engineer
Brooklyn, NY

Greyson Simon
*Assistant Production Manager at a
factory*
Seattle, WA

Krissy Avise-Rouse
Clergy
Columbia, Illinois

Caine Rees
student
Bloomington IN

Tracey Jones
Unemployed
Arlington, Texas, USA

Benjamin Schaffer
Software engineer and bus driver
Passaic, NJ

Katy Kelly
Japanese-English Translator
Huntsville, Alabama

A. Cody Kuhn
Teaching Assistant/Graduate Student
Austin, TX

Morgan Hale

Student

Rochdale, United Kingdom

Malia Cumming

Access Services Assistant (Library)

Hillsboro, OR

A Seebach

Programmer

Northfield, MN

Shannon Kelly

Recruiter

Chicago, IL

Elizabeth McClellan

Lawyer

Memphis, TN

Ella Kurki

graphic designer, barista

Helsinki, Finland

Kate jacobs

Account Manager

Columbus OH

Kassandra Fernandez

Graduate Student

Miami, Florida

Basil Saylor

Baker

Brooklyn, New York

Jesse Neubauer

Account Specialist, JPMorgan Chase

Westerville, OH

David Turnbull

Programmer

Calgary, AB, Canada

Eric Vilas

student

Argentina

Rue Lineback

Grocery clerk/stocker

Greensboro, North Carolina

Kareem Ibrahim

Law student

Vancouver, Canada

Keavy Handley-Byrne

Photographer and Educator

New York, NY, USA

Sophia Pelecanos

Law student and paralegal

Boulder, CO

Thomas Oltarzewski

Digital Content Creator

NJ

Doss Stone

Coffee shop

St Louis MO

Chloe O'Hara

Library Page

Wisconsin

Darian Bemis

unemployed

Pima

Shelby Cragg

Artist

california

Ash Kulak

Lawyer

Bloomington, Indiana

Sitara Herur-Halbert
Nonprofit Communications
Tarrytown, New York

Katie Stafford
Software Engineer
Wichita, KS

Claudine Castano
Registered Nurse
Baltimore, Maryland

Aran Ink
software engineer
Cambridge, MA, USA

Edison Potter
Accounting specialist
St Paul, MN

Amy Laney
Student/Dishwasher
Portland, Oregon

Lila Garrett-Wejksnora
Writer
Cambridge, MA

Danielle Montgomery
Warehouse Associate
St Louis, MO 63118

Chris Mills
Freelance Illustrator
American from Texas living in
Cambridge, England

Sammi Wilder
Illustrator/Entertainer
Hamden, Connecticut

Loxley Blaine
Kitchen worker
Jefferson City, MO

Suzie Nieman
self employed
Philadelphia, PA

Erry Kostala
Software Engineer
London, UK

Raine Serrano
Software Engineer
Seattle, Washington

Lael Birch
Software engineer
Wendell, MA

V Kelly
unemployed
Plymouth, New Hampshire

Sydney Jackson
Laboratory Specialist
Tucson, AZ

TJ Sheff
Construction Safety Manager
Pomona, California

Elianora Rose
Software Engineer
Ohio

Daria Brashear
Software developer
Providence RI

Case Saeger
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Devin Berry
Cafe Manager
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Kit Stubbs

*founder/executive director of a
nonprofit*
Somerville, MA

Aster Gill

Student
Brooklyn, New York

Haley Sanders

Law Student
Los Angeles, CA

Frederic Chandler

sysadmin
New Jersey

Spot Star

Student
Arlington Texas

John Bridgman

Disabled
Canada

Millie Foley

Student
Gothenburg, NE

Kit Bennett

Unemployed
Manheim, PA

Taylor Anderson

Game developer
Toronto, Ontario, Canada

Marty Galvan

Childcare Provider
Harlingen, Texas

Jordan Thevenow-Harrison

*educational software designer and
learning scientist*
College Park, Maryland

David O'Boyle

Operations Analyst
Seattle, WA, USA

Trivia Fox

Project Manager
Minneapolis, MN

Kay Kraft

IT Administrator
Las Vegas, NV

Mars Panzica

Tech Support
Chicago, Illinois

Nasper Caron

Unemployed
Bedford, MA

Emily Prince

Attorney-Adviser
District of Columbia

Lena Fanya Aeschbach

Scientific Assistant
Switzerland

Blaine Flowers

Financial Accountant
Portland, OR

L.X. Hammond

Unemployed
Baltimore, MD

Alex Petkanas

Lawyer
Anchorage, AK

Cassandra Lone

Disabled
Duluth, MN

Eric Davies

software developer
Winnipeg, MB, Canada

Kevin Tilton

Project Manager
Spotswood, NJ

Zack Schuster

Web Developer
Stockton, CA

Damien Niesewand

childcare provider
NY

Kendra Albert

Lawyer
Philadelphia, PA

Morgan Stickle

Unemployed
Mokena Illinois

Pippin Shaeffer

Student
Lees Summit, MO

David Hoffman

Game developer
Ichikawa, Japan

Jay Grey

Manager at a Tech Platform
Brooklyn, NY

C H¹

IT Consultant
Canada

Adam Donovan

Contact Tracer
Buffalo, NY

Mikayla Mann

Attorney
Goldsboro, North Carolina

Aaron Kehl

Freelance Author
East Grand Forks, MN

Cal River

student
Modesto

Nynaeve Mutch

Live Captioner
Colorado Springs, CO

Avery Roberts

Customer Support caller
Salt Lake City, Utah

Dezi Liese

Accounts Payable Administrator
Brooklyn, NY

Siv Natanael Hjortland

¹ *Amici's* names with initials have been kept anonymized at their request, for various reasons, including that they might not be “out” to the public, that they fear violence because of their transgender status (and fear being readily identifiable on a public list of this kind).

Game Develoer
Norway

Daniela Medina
student
Stockton, CA

Tobin Fleck
Clergy
Greensboro, North Carolina

Ryn Daniels
Site reliability engineer
Berlin, Germany

Eddie Doyle
Accountant
Canada

Alcaria Bordelon
Hospital Environmental Technician
Lawrence, Kansas

Alyssa Gingras
Agronomist
Guelph, Ontario, Canada

Monica Miller
Artist, arts consultant
Milwaukee, WI

Meli Jackson
Personal Shopper
Leicesters, Massachusetts

Jo Sillars
Student
Manchester, UK

Harri Cound
Programmer
United Kingdom

Olivia Throckmorton
Printmaker
Nashville, TN

Tori Kaufman
Student
Ohio

Julie Chael
student
Chicago, IL

Kim Mortimer
Data Manager
Halifax, Canada

Jasmine Schatz
Account coordinator
Massachusetts

Aileen Gijsberti Hodenpijl
Student
The Netherlands

Apollo Wardojo
Student
Jakarta, Indonesia

Zury Reyes
Cashier
Seattle, WA

Tyler McCreight
Nurse
Canada

Alyson Yee
Freelance graphic designer
Los Angeles, California, USA

Rey Stoddart
Unemployed (disabled)
Rochester, NY

Ben McLaughlin

Social Worker
Northampton, Massachusetts

Molly Shores

Self employed
Charlotte, NC

Lore Poe

Theater Co-op
Schenectady, NY

Nic Wong-Balzano

Student
Manorville, New York

Morgan Brownlee

Legal Admin Assistant
California

Elyse Lewis

Grad student
Seattle, WA

Elle Heedles

poet / writer / cleaning staff
Vienna, Austria

Stephanie Conway

Office worker
Ireland

Madison Patterson

Delivery Driver
Westminster, Colorado

Breanna Howell

Merchandiser
North Dakota

Ryleigh Brimhall

Admin Coordinator for local NPR station
Seattle, WA

Jacob Hall

Journalist
United Kingdom

Scott Castner

Artist (Self Employed)
Wilsonville, Oregon

Brittany Marie Murphy

Unemployed
Brooklyn, NY

Jude Shimer

Salesforce Administrator
Brooklyn, NY

BB Burrowes

Graduate Student & tattoo artist
Santa Cruz, California

Maxx Corvello

Student
Vacaville California

Gil Olivas-Etherington

unemployed tattooer
Minneapolis, Minnesota

Briar Patriarche

Temp office worker
Vancouver, Canada

Nick Barbieri

vape shop clerk
Torrington, CT

Charlie Rickard

Fast food employee
Rocky Mount, Virginia

Allegra Kistler Ellis

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Kalamazoo, Michigan

Tilde Thurium
Software Engineer
San Francisco, CA

Dexter Collingwood
Baker
Portland, Oregon

Thais Correia
Software Developer
Framingham, Massachusetts

Galahad Strange
Sex Toy Shop Employee
Edmonds, WA

Thompson Usiyan
Software Developer
Cupertino, CA

Willow Idlewild
Project manager
San Francisco, CA

Jamie Merriam
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Machias, Maine

Vesper Mikan
Coach, Chef, Photographer, ect
Seattle, WA

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software engineer
Portland, Oregon

Midavi Hayden
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Project manager
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Retail worker
Wethersfield, Connecticut

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Student
Sammamish, Wa

Brit Noordman
Tech Support
Shelton, WA

Ren Vice
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Blue Inessa
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Rachel Johnson
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Denver, Colorado

Lennon Sherburne
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Jill Rycerz
Data Analyst
Massachusetts

Kimberly Howell
Service Operations Analyst
South Jordan, Utah

Sam Selman
Support Specialist
Norcross, GA

R Malek
CEO - Internet Provider
Mason City, Iowa

Molly Skjerven
Law student
Chicago, Illinois

Henry Bennett
Potter
Tulsa, OK

Mason Donahue
CISO, Lucy Parsons Labs
Chicago, Illinois

Bennett Adams
Software support technician
Norcross, GA

Hannah Valenta
Retired Navy
Florida

Krysta Mayo
Spiritual Advisor
Los Angeles, CA

Tanya Williams
Call center representative
Colorado Springs, Colorado

Juniper Forest
Self employed
Eugene OR USA

Billie Hanson-Ulrich
Nanny/educator/artist
Melbourne, Australia

Tazwell Simmons
Unemployed
Hershey, Pennsylvania

Kali Rainwater
US Navy Sailor
Monterey, CA

Nikki Ronca
Transportation Manager
Maple Shade, NJ

Olly Galarza
Retail employee
Naples, Florida

Tina Hill
Unemployed, disability carer
Shellharbour, Australia

Ada Park
Unemployed (disabled)
Cumming, GA

Indie Martinez
call center employee
Flovilla, GA

Abigail Richard
Artist
New Orleans, LA and Lakewood, OH

Myrin James
Teacher
Tacoma, Washington

Malakai Corvus
Insurance representative
Tempe, AZ

Katie Funk
Disabled
Glendora, CA

Xandra Church
child care / student
North Carolina

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Camryn Monzo

Business/Data Analyst
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Reuben Raiti

Unemployed
New Hampshire

eli casavant

Cashier and Student
Poolesville, Maryland

Haye Moon

Educator
Delray Beach, FL

Melissa Lindley

Employed at a food pantry
New Jersey

Christopher Robin Wamsley

student
NY

Bella Atwell

*Barista/Tattoo Floor Walker/Vintage
Clothier*
Massachusetts

Judas Steffee

Student
Little Rock, Arkansas

cheyanne stone

retail
philadelphia, PA

Bellamy (Bel) Quarless

Student
Seattle

Oliver Caldwell

Freelancer
Chicago, Illinois

Sadie McDaniel

Clinical therapist
Nashville, TN
Ana Artigues
Student
Charleston, South Carolina

Callie Little

Author
Seattle, WA

Kori Griffith

Student
Minnesota

Zoë Lappin

Student
Los Angeles, California

Rhiannon Murphy

Unemployed
Philadelphia, Pennsylvania

Kate Estell

student
Southington, Connecticut, USA

Alex McEwin

Student
Canada

Bek Brucker

Fiduciary for Washington State DCYF
Everett, WA

Joyce Barbour

Program Coordinator, Arts Non-profit
Louisville, KY

Charlie Bronwyn

Sex worker
Portland, Oregon

Lindsey Cherek Waller

Artist

Red Wing, MN

Ann Mastandrea

Student

Cleveland, OH

Monroe Standish

Student

CT, USA

Jordan DeSwarte

Student, sex educator, unemployed

Minneapolis, MN, USA

Justine Munich

PhD Student

BC, Canada

George Stevens

Student

United Kingdom

Dre Ceja

Director of Training & Education

Harrisburg, PA

Aksel Vega

Student

Tucson, AZ

Dre Ceja

Director of Training & Education

Harrisburg, PA

Lauren Gargiulo

Underemployed writer

Canada

Frankie Laird

Technical Writer

Pennsylvania

Sohriya Brown

Barista

Seattle

Dave Macdonald

Accountant

British Columbia, Canada

Samantha Reeve

Community organiser, event manager

Canada

Bobbie Aegis

Unemployed

Harvard, Il

Racine Lancaster

Artist

Philadelphia

Boris Kabistan

Amazon shopper

Madison, Wi

Mako Steiner

Service Director at a Funeral Home

Simi Valley, CA

Ari Cottingham

Writer, record shop clerk

Berlin, Germany

Dolan Dolan-Wolfe

House Spouse

Portland, OR

Freja Schaumburg

Student

Denmark

Elizabeth Green

Unemployed

West Hazleton, PA, USA

Elizabeth Green
Unemployed
West Hazleton, PA, USA

Nelly Kelly
Playwright
Scotland

Ryde Terry
Food Service
Payson, Utah

Kim Mathieson
Biomedical Scientist
Scotland, UK

Day Wheatley
Photographer
West midlands, england

Elinor Lower
Artist, Producer
Bristol, UK

Miria Bowers
Library Clerk
Los Angeles, CA, USA

Tayler Larson
Strength & Conditioning Coach
Portland, OR

Jazmin Lemus
Unemployed
Orem, Utah

Sidney Majewski
Bank Teller
Philadelphia, PA

Jazmin Lemus
Unemployed
Orem, Utah

Finn McRae
eLearning Instructional Designer
Ypsilanti, MI

Vinny Williamson
Student
Glasgow, Scotland

Meg Cunningham
Broadcast journalist
Canada

Blair Henney
Marketing assistant
Lanarkshire, Scotland

Charlie Strange
Carer
Seattle, WA

Jaxon Dufour
Cashier
Aurora, Colorado

Corvus Campbell
Cafe & retail worker
Victoria, BC, Canada

Haley Staffel
Food runner/unemployed due to covid
Toronto, ON, Canada

Randi Richards
Executive Customer Advocate
Landing, Michigan

Beverly Ho
Cook
Alert Bay, Canada

Kat Akeela
Sex education
US

Jem Milton

Illustrator

Glasgow, Scotland

Jessica Tornga

Screen printer

Boise

Julianne Villegas

Unemployed

Sacramento, CA

Ella Smith Jr

Hospital administrator

Amsterdam, Netherlands

Logann Finkel

Actor/Writer/ Advocate /Mentor

Guttenberg, NJ 07093

Skyler Sinclair

unemployed

San Bernardino, CA

Clover Kishbaugh

student

Pennsylvania

Roman Cohen

student

Irvington, New York

Regina Sheridan

*Operations Manager of Statewide Not
for Profit*

Orlando, FL

Joshua Chenlee

Peer health educator

Oregon

Ea Andersen

Student

Copenhagen, Denmark

Colleen Kimseylove

Research coordinator

Seattle, WA

Rafael Gomez

Researcher

NY, NY

J. M. Archer

Freelance writer and dramaturge

Canada

Sami LaRose

Retail worker

New York

Jade Forbes

Student

England

Finn Carter

Student

Ireland

Amy Strickland

Textile Colorist

Elkton, Maryland

Jasmine-Rose Derenoncourt

Student

Goleta, CA

Orlanda Alldridge

Carpenter

Victoria, Australia

Sarah Pitney

Immigration attorney

Washington, DC

Emily Bryant

Stylist

Vancouver, Canada

Dani Thomas

Chemist
Syracuse, NY, USA

Margarida Salvador

Brokerage analyst
London, United Kingdom

Carmen Smith

Self employed
Toledo, ohio

Maverick Billings

Marijuana Trimmer
Longmont, Colorado

Liliana McCaffrey

Student
Albany, New York

Jack Hendrix

PhD student
St. John's, Newfoundland, Canada

Alek Paul

Student
Ontario, canada

Jimena Centeno

Auto Body Collision Repair Student
Minneapolis, MN

Galen Lewis-Chan

Barber
Vancouver, BC Canada

Tom Walters

Freelance artist
England

Diamond Feit

writer
Japan

Jay Klyman

Mental health counselor
Berkeley, CA

Christina Elias

Hr Coordinator
Toronto, Canada

Jackie Fox

Content Creator
Ocean Isle Beach, NC

char Campos

Youth Organizer
Mcfarland

Chelsea Crandall

Nonprofit Associate
Oakland

Agnieszka Buczkowski

Barista, Student
La Salle, IL, USA

Sarah Haegele

Mortuary student
Ames, Iowa

Fran Gallagher

Fabricator
Chicago

Allana Gartzke

Child care worker
CA, USA

Anna Murray

membership associate
Renton, WA, USA

Ray Soller

unemployed
Dentkn, Texas

Emma McClure
Graduate student
Toronto, ON, Canada

Stevonnie Ross
Copyeditor
Jersey City, NJ

Brianna Rafidi
stage manager
New York, New York

Melissa Jennings
Student
Scotland

Elizabeth Perez
Unemployed
Brooklyn, NY

India White
Student
Olympia

Syann Lunsford
librarian
Los Angeles, CA

Sab Konick
Freelance artist
Philadelphia

Kamil White
Photographer/Unemployed
Newark, DE

LJ Tlustos
Unemployed
Sioux Falls, SD

Kimbal Hyszka
Unemployed
Canada

Jordan Scruggs
Consultant
Chattanooga, TN

Aibhne Paton
Not applicable
Scotland

Katrina Poharama
Masters student
New Zealand

Alicia Maldonado
Insurance agent
Tucson, Arizona

Ayebainemi Ese
Yoga + meditation practitioner
Debrecen, Hungary

Briar Brodwell
Licensed Dispensing Optician
Seattle, WA

Joshua Dawn
Catering manager
Port Coquitlam, BC, Canada

Viktoria Klein
Dental Technician
Germany

Elliott Ruck
Pastry chef
Raleigh, NC

Shay Dax
Part-time work
Brooklyn, NY

Lucy James-Olson
Student
Amherst, MA

Jesse Lake

Mother
Richmond, VA

Kendra Shreve

Unemployed
Brooklyn, NY

Fittonia Argyroneura

Unemployed / Writer
Andover, Connecticut

Hearher Charlton

Graphic designer
England

Liv Headley

Unemployed
Delaware

blair crissman

Artist / Activist
Brooklyn, NY

Laura Rubino

*PhD Candidate and Distance Learning
Facilitator*
Ohio

Ozzie Pace

unemployed
Bellingham, WA

Kareena Romero

School para
CO

Mallory Larcom

Unemployed
Portland, OR

Dan Goetz

Unemployed
Brooklyn, NY

Madi Boyett

Social worker
Denver, CO

Jordan Scruggs

Consultant
Chattanooga, TN

Genna Baker

Self-employed artist
Illinois

Kai Ross

Unemployed
West Palm Beach, Florida

Meredith Isensee

Operator
San Jose, CA

Barrie Fein

Permanently Disabled
Forest Hills, NY

cassandra nikac

Self-employed
New York City

Nishi Gouldbourne

Cashier
Toronto, Ontario, Canada

Win Wright

Web Developer
Kansas City, MO

Jessica (Jessie) Milne

Clinical Research coordinator
Ypsilanti, MI

Emery Tillman

Artist
New Orleans, LA

Kristen Dabney

Higher education administration
Somerville, MA

Alex Lacelle

PhD candidate
Montreal, QC, Canada

Nic Laschever

Rock climbing instructor & graphic designer
Boston, MA

Morgan Adams

Student
Tallahassee, FL

Shelby Fallis

Therapist
IN

Dex Greenbright

Artist and writer
Chicago, Illinois

Michael Moore

Online sales
Cary, il

Hayley Gentilini

Unemployed
Frederick, MD

Jess Berge

Teacher
Brooklyn, New York

Dani M.

Artist
New Jersey, US

Hadley Johns

Seasonal trail worker
Portland, OR

Devin River

Unemployed
Olympia, WA

Miriam Kearney

Unemployed
Guelph, Ontario, Canada

Adrian Bouvier

Bookkeeper
Bedford, New Hampshire

Dino Zittlau

Barista
Calgary AB Canada

Kathryn Dahel

Barista
Ontario, Canada

Vinny Verburg

Student, Artist
Greensboro, North Carolina

Frederick Anex

Retail worker
Tacoma, WA

Shannon Tilley

Student
Laguna Niguel, CA

Emerson Roach

Tattoo artist and business owner
Nova Scotia, Canada

Aneidys Reyes

Stay at home parent
Madison, Wisconsin

Anton Carlsson

Student
Sweden

Danyell Davis

case manager for queer law firm
New Orleans, LA

Karolina Kubinova

customer support specialist
Prague, Czech Republic

Parker Morgan

Administrative Assistant
Wacissa, Florida

Kit MacNeil

Adjunct Professor
Buffaly, NY

Kat Merks

Hairstylist
Montreal, Canada

Charlie Jones

student
Poughkeepsie, NY

Tyler Cronan

Delivery Driver
Worcester, MA, USA

Danielle Reveld

Contact Tracer
NYC

Jessica Charlton

Director of Animal Shelter
Seattle, WA

Paresseux Caudle

pet sitter
Alabama

Nikita Matfin

System Administrator
Newcastle, UK

Taylor Norris

Library circulation/book shelver
Tennessee

Cameron Staub

Student
Carmichael, California, USA

Kelly Miklas

MA student and research assistant
Columbia, MO

Mackenzie Maher

Wawa overnight clerk
Ocean County, New Jersey

Heather-Lynne Van Wilde

Legal Journalist
Portland, Oregon

Nadya Mariam

Student
Wisconsin

Ingrý Thurow

Trails manager
Portland, Oregon

Amy Muniz

Disabled
Ellenville, New York

Autumn Ricketts

Unemployed
Watsonville, California

Shimon'ah Shushan

Theatre Designer
San Diego, Ca

Caroline Dall

Hair Dresser
Portland, OR

Nikita Szylo

Programmer

Czerwona Niwa, Poland (before the pandemic: Warsaw, Poland)

El Evans

Social worker (Harm reduction counselor)

Brooklyn, NY

Xander Heckman

Student

Newburyport, MA

Joy Yukumoto

Student, Retail Worker

Kāne'ohe, Hawai'i

Zoya Sarow

Program Coordinator

Denver, Colorado

Lindsey Mechuta

Student

Virginia

Catherine Hamilton

Sales Clerk

Missoula Montana

Michaela Jones

Film Production Coordinator

Ontario, Canada

Sez Morales

Food Pantry Coordinator

South Hadley, massachusettes

August Cason

Resource coordinator

Baltimore, Maryland

leti soriano

Student

New Orleans, LA

Josiah Valle Ellis

Artist

Brooklyn, NY

Aspen Carter

Kennel Technician

Denton, TX USA

Andrew Sacher

Software Engineering Manager

San Francisco, CA

Sam Calvetti

Public Health Research Assistant

Los Angeles, CA

Shannon Tilley

Student

Laguna Niguel, CA

Echo Vieira

Public Health

Canada

Arie Van Antwerp

Software Engineer

San Francisco, CA, USA

Dakota McCallister

Student

San Antonio, Texas

Camden Gouveia

Student

Acton, MA

Mone Wallin

Medical student

Sweden

Kaylee Novakovski

Student

Canada, Calgary

Nikki Vazquez
Teacher
USA

Ariel Acevedo
Artist
Massachusetts

Saskia Lara Neupert
Unemployed Artist
Berkeley, California

Sydney Anderson
Receptionist
Chicago, Illinois

Elizabeth King
Teacher
Baltimore MD

Kate Stevens
Student
Penticton, BC, Canada

Nyk/Kiki Laurence
Barber
Brooklyn, New York

Kelsey Koch
Graphic Designer
New York, NY

Hager Hassanein
Server
San Francisco

Mika D'Angelo
Law student
Monmouth Junction, New Jersey

River Walker
Unemployed
New York City

Daniel Splitter
Self-employed Online Resale
Olympia, Washington

Sy Bedrick
Apprentice Jeweler
Providence, RI

Mary Elise Elam
Technical Director
Vancouver, BC, Canada

Alex Phelps
Mental Health Specialist
Nashville, TN

Laiba Qureshi
Student
Aarhus, Denmark

Cal Lynes
Disabled
Vermont

Lauren Mack
Actor & Teacher
Brooklyn, NY

Anni Jefferson
Student
Canada

Linden Moore
Unemployed
Providence, Rhode Island

Molly Gould
Behavioral Technician
Mendon, Massachusetts

Elias Ponhold
Student
Austria

Sky Simon

Rental Assistance Specialist
Boston, Massachusetts

Chase Gilley

*Digital Marketing Specialist, Umpqua
Community College*
Roseburg, OR.

Frances Metzger

Hotel Front Desk
Big Sky, MT

Mel Nyx

Test Engineer
Brooklyn, NY

Micky Reynolds

Student
Ottawa, Ontario, Canada

Katherine Dever

Student
AK

Mars Rembolt

Food Packager/Student
San Diego, California

Julie Wills

Unemployed
Canby, OR

Ruth Wejksnora-Garrott

psychologist
Cambridge, MA

Valyrie Autumn

Student
Houston, Texas

Jamie Emmott

Student
Edinburgh, Scotland, UK

Quenby Harley

Admin Worker and Part-time Artist
UK

Sara Bellusci

Unemployed
South Pasadena, CA

Xadie Antonio

Musician/artist/performing artist
Denver, Colorado

Damien Fox

Freelance Illustrator
Aiken SC

Heather Griffith

Bus and paratransit operator
Missoula, Montana

Elle Dietz

Researcher
Sacramento, California

Parker Ellis

Retail Associate
Raleigh, North Carolina

Melody Rainpod

Student
Russia

Katie Loop

*Equity and Diversity Program
Specialist*
Saint Paul, MN

Sam Miller

Volunteer Coordinator
Los Angeles, California, USA

Oleander R.

Student
Georgia

Jay Scott

Retail Associate

Bellingham, WA

Stacey Spectacular

Sex Worker

New Orleans, LA

Jenna Messer

Admissions counselor

Columbus, Ohio

Luca Forcino

Student

Brooklyn

Aria Stewart

Computer Programmer

Salem, MA

Maachi Naakamutunii

Residential Advocate at shelter

Confederate Tribes of the Grand

Ronde land Portland, OR

Aza Olsrud

Disability

norway

Jacqalin Keeling

Disabled

NY

Deborah Ridenour

Social Worker

Lake Orion Michigan

Meg Chaperon

Unemployed

Chicago, IL

D. Bouchard

Social Worker

Burlington, VT

Annyston Pennington

Graduate Student

Virginia

Lee Tausch

Student

Overland Park, Kansas

Lark McManus

Disabled

Scotland

Katherine McFarlin

Student

Houston, TX

Max Pizzardi

Research and Evaluation Analyst

New York, NY

Anlee Manaloto

Billing Clerk

Astoria, NY

Zoo Holmstrom

Social media manager

Los Angeles, CA

Em Kitchens

Student

Charleston South Carolina

Grayson Greening

Immigration paralegal assistant

Denver, CO

Ilsa Dohner

Student

Syracuse, NY

Tobi DiSalvo

Unemployed/Artist

Delaware

Julia Moquin
Set Decorator
Los Angeles, California

Charlotte Sullivan
Support worker
London, UK

Jane-Victorius Bonsaksen
Student
Norway

Andrew Rich
Doula, Lactation Professional
LaGrange, Kentucky

Bailey Pfeifer
Therapist
Chicago, IL

Jenna Brown
Doula
Austin TX

Belacqua Behnke
Graduate Student
Lincoln Park, MI

Kate York
Birth Worker, Lactation Counselor
Ypsilanti, MI

Kevin Sem
Student
Orway

Jeremy Bowen
Full-Spectrum Doula
Seattle, Washington

Gabriella Davidson
Unemployed
Tacoma, Washington

Michele James-Parham
Midwife & Sex Education Instructor
Pittsburgh, Pennsylvania

Arleigh Hitchcock
Wetlands Ecologist
Fairbanks, AK

Julia Quandt
library assistant
California

Wren Cooke
Stage Manager
Baltimore, Maryland

Magdalen Wulf
Doula
Baltimore, Maryland

Camille Paquette
Cook
Montreal, Canada

Kimberly Powell
Teacher, Tutor, Business Owner
New York City, NY

Ash Trull
Software Engineer
Lakeville, MA

Cory Bush
Doula
Brooklyn, NY

Beckie Moriello
Lawyer
Durham, NC

cat crow
Disabled Student
Hurst, Texas

Neil Girling
Engineering Director
Oakland, California

Michele Keller
Software Developer
Austin, TX

Dani Rodriguez
Environmental Aide
Chatham, NJ

Josie Breck
Librarian/Artist
Baltimore, MD

Matthew Bischoff
CEO
New York, NY

Zoe Province
Customer Care
Springfield, IL

Hannah Kane
Librarian
West Bend, WI

Siobhan Vega
Production Assistant
New York, NY

Terry Caber
Art Director
Hamburg, NY

Veronuca Red
Data Scientist
Washington, DC

Sam Herett
Unemployed
London, England

Alex Taylor
Student Nurse
United Kingdom

Frankie Black
Unemployed
Demorest, GA

Chris Thayer
Research Associate/Data Scientist
Atlanta, GA, USA

Emrys Travis
Student
UK

Mariana Poole
Adjunct professor
Graham, North Carolina

Hayley Henebury
Disabled/Unemployed
Rhode Island

Kimberly Rhoten
PhD Candidate
Somerville, MA

Laine Altman
Student
Modesto, CA, USA

Quinn Dunham
Unemployed
New York, NY

Rebekah Jackson
Legal Assistant
Florida

Shane Hicks
Author and Artist
North Carolina

Marina Martinez-Bateman
CEO
Portland, Oregon

Abigail Jans
Homemaker
Woodway, Tx, USA

AJ Luxton
Writer
Portland, Oregon

Ian Estes
Deli Clerk
Portland, Oregon

J. L. Baldrige
Disabled Homemaker
Tacoma, WA

Andra (Amanda) Atkins
Educational Technology
Imlay City, MI

Alex Conall
disabled
Tacoma WA

Jiz Lee
*Actor and Author Working in the
Fields of Gender and Sexuality*
Oakland, CA USA

Nicole DeLeon
Manager
Fort Myers, FL

Alex Byrne
Librarian
Tacoma, WA